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The Department of Industrial Relations (DIR)/Division of Workers' Compensation (DWC) policy and plan for managing external access to the Electronic Adjudication Management System (EAMS)

Introduction

This document describes the DIR/DWC policy and plan for managing external access to EAMS. EAMS is a computer-based system designed to simplify and improve the DWC's case management process.

The goals of EAMS are to better serve injured workers and employers by eliminating redundancy, creating efficiency in the system and making the system more accessible to users, while preserving confidentiality.

External system users are injured workers, attorneys, claims administrators, lien claimants and others who need to file forms and documents with the DWC district offices and the Workers' Compensation Appeals Board (WCAB) Reconsideration Unit. These external users need access to the system to file forms and documents, and to review information contained in case files. Prior to EAMS implementation, all forms were filed on paper and stored in paper files at district offices, DWC headquarters and the State Records Center.

The original vision for EAMS was to provide all case parties with electronic access to the system via a logon, which gives parties access to documents in DWC's case file, as well as electronic forms and other case data. Special Project Report (SPR) 3 included language calling for additional funding for the provision of greater access to the system for external users. This funding was approved in the provisional language of the budget. Toward that end, the Office of the Chief Information Officer (OCIO) required the Department of Industrial Relations (DIR), DWC's parent agency, and DWC to meet six criteria before the funding would be released. One of the criteria is the DWC's policy and plan for managing external access to EAMS.

While the original vision for EAMS was to provide access to case information and electronic filing through the logon mechanism previously mentioned, budget and management issues related to this mechanism, as well as discussions with external stakeholders, have revealed that DIR/DWC needs to expand access to EAMS in ways that meet external users' principal needs, work with the existing system architecture and are executable within the budget provided.

DIR/DWC's overarching goal is to provide electronic filing and access to documents and case information to all parties. However, real world issues that could prevent initial universal electronic access must be acknowledged. Because the DIR/DWC is limited by these constraints, a multi-pronged approach to increasing access is recommended. This approach includes expanding current methods of access to the system while developing new methods and managing access overall. Accordingly, this policy and plan consists of the following sections:

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Section 3
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SECTION 1
GENERAL POLICY AND OVERALL OBJECTIVES RELATED TO EAMS
EXTERNAL ACCESS

DIR/DWC's overarching goal is to provide electronic filing and access to documents and case information to all parties. However, real world issues that could prevent initial universal electronic access must be acknowledged. Therefore, DIR/DWC will prioritize its work to meet external users' principal needs, while minimizing manual processing.

External users' principal needs are identified as:
1. Filing forms and documents in a case
2. Looking at forms and documents filed in a case
3. Looking at case participant information
4. Looking at hearing information.

The current top priority for the division and for external users is efficient electronic filing with a minimum of manual intervention.

It is anticipated that DIR/DWC will provide external users with a variety of options to file forms and documents and to review information in the case file, keeping the focus on principal needs, while moving toward full electronic access for all.

To this end, it is also anticipated that DIR/DWC will introduce "split access" to the current system, which will allow users to choose whether they want to file, view case documents or access case file information. "Split access" is discussed in section 5 of this document.

The overall objectives are to:
  - ➢ Ensure the system is sustainable over time
  - ➢ Ensure external users have a method of filing that meets their needs
  - ➢ Ensure the greatest number of external users possible are filing documents electronically
  - ➢ Ensure external users have a method of reviewing case file information that meets their needs
  - ➢ Ensure DWC and WCAB staff are able to efficiently process external user forms and documents in EAMS
  - ➢ Improve the overall external user experience of EAMS
  - ➢ Comply with state and federal laws related to public records and privacy.

SECTION 2
CURRENT PROJECT STATUS AND PROBLEM STATEMENT

Current Project Status
The implementation of EAMS is occurring in two phases:

Phase One—internal user access: This phase is complete. The system went live for internal participants—DWC and Workers' Compensation Appeals Board employees at DWC administration and district offices—Aug. 25, 2008. At that time external users began using specially designed optical character recognition (OCR) forms, which are processed into EAMS in a multi-step fashion by DWC district office staff.

Phase Two—external user access: This phase is in progress. The division began bringing external users into the system Sept. 22, 2008. A group of over 250 external users, who have agreed to file all their forms and documents electronically, currently have full access to both file and view all their case documents in EAMS in what is known as the "e-forms trial."

Gradual steps to add external filers to the e-form trial are in process, including several approved to file liens on behalf of other system/case participants as described in section 5B of this document.

External users who are not in the e-forms trial file OCR paper forms.

Problem Statement

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The two methods of filing in EAMS (OCR and e-forms), as they currently exist, are not the most efficient ways to get forms and documents into EAMS. While improving on fully manual data entry systems, each of these methods poses its own problems.

E-forms work well on several levels: once they are filed correctly they trigger work flow and provide external users with many benefits, including the ability to set their own hearing dates. However, e-forms were designed to be filled out one at a time and there is no automatic notification of errors to filers. Additionally, e-forms require a logon to use. Because the division has a limited number of licenses for external participants, and because of the level of manual intervention required to register participants and correct errors, the division has given out a limited number of logons to external participants.

Regarding OCR forms, the scanning of hundreds of thousands of paper forms and documents at DWC district offices is plagued by intermittent hardware and software problems, as well as insufficient attention to highly regimented formatting needs that often lead to rejection based on errors in forms.

The DIR/DWC faces three major issues related to access for external participants:
1. DIR/DWC needs to provide a more efficient way to electronically file forms and documents
2. DIR/DWC needs to provide external users with efficient access to case information and documents
3. Both of these efficiencies must be created within a limited budget.

SECTION 3
IDENTIFICATION OF EXTERNAL USERS AND THEIR ROLES

For purposes of accessing EAMS, external users include:
- Unrepresented injured workers
- Represented injured workers
- Attorney representatives
- Non-attorney representatives
- Claims administrators
- Lien claimants
- Third party filing vendors
- Unrepresented uninsured employers
- The general public

External Participant Definitions
➔ Unrepresented injured worker: An injured employee with an active case before the Division of Workers' Compensation/Workers' Compensation Appeals Board who is not represented by an attorney
➔ Represented injured worker: An injured employee with an active case before the Division of Workers' Compensation/Workers' Compensation Appeals Board who is represented by an attorney

➔ Attorney representatives: A law firm or sole-practitioner attorney representing applicants or defendants

➔ Non-attorney representatives: An organization or individual hearing representative who appears before the DWC/WCAB but is not a licensed attorney

➔ Claims administrators: An insurance company or self-insured employer that self-administers its claims, or a third-party administrator organization or individual representing insurance companies or self-insured employers

➔ Lien claimant: An organization or individual with a claim for payment for services rendered

➔ Third party filing vendor: An organization or individual, which is not a case participant, but which provides filing services to case participants

➔ Unrepresented uninsured employer: An illegally uninsured employer joined to a case by the DWC/WCAB

➔ The general public: Individuals or entities seeking access to public records contained in DWC/WCAB case files.

SECTION 4
DESCRIPTION OF HOW EXTERNAL USERS CURRENTLY ACCESS EAMS

Filing Access
The DIR/DWC currently offers two methods for external users to file in EAMS:
1. Electronic forms (e-forms): External users participating in the e-form trial prepare and submit forms and attachments online through EAMS. These users have an EAMS user name and password, the combination of which equates to a "logon."
2. OCR (paper) forms: External parties prepare either DWC-created forms provided on the Web site, or vendor-created forms they purchase, for filing with the DWC. In either case, the documents are hand delivered or mailed to a DWC district office where they are processed into the system by a DWC employee.

Viewing Access[1]
The DIR/DWC currently offers two methods for external users to view case information:
1. On line via a logon: External users who are parties to the case may view case information and documents in EAMS if they have a logon
2. On line via the DWC Web site: Members of the public may search the DWC's database for information on active disputed workers' compensation cases using the EAMS public search tool. This tool returns limited information about the case, including:
   - Injured worker last name
   - Injured worker first name
   - Case number

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[1] External users can view the paper case file (old or legacy files, which have not been scanned into EAMS) in person at district offices. Case parties and others may view/copy the file by requesting the hard copy. If any portion of the case file is in EAMS, copies of those documents are copied to a storage device. Copies of case documents are provided at the external user's expense

- Date of injury
- Employer name
- Case status (only active cases displayed)
- Next hearing date

No case documents are available through this Web site.

SECTION 5
DESCRIPTION OF PLAN TO EXPAND CURRENT ACCESS METHODS

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Expanding Current Filing Methods

Under the current system structure, e-form filing is the most efficient method of filing forms and documents for external users and DWC. Therefore, expanding e-form filing will be part of improving filing access for external users. In addition, DIR/DWC will expand current access methods by:

A. Introducing "split access" to the current system

B. Increasing the number of external user licenses and changing the license type, which will allow the DIR/DWC to provide access in ways that meet external user needs

C. Introducing a "filing only" level of access utilizing the current e-forms

D. Expanding the amount of information obtainable without a logon

E. Revising optical character recognition (OCR) forms

A. Introducing "split access" to the current system

Under the current system structure, users must log onto EAMS through a single portal which allows access to the case management, document repository and electronic filing elements of the system as a total package. DIR/DWC will provide greater access to file documents, view documents and view case information by creating a single sign-on that leads to separate paths. This method will provide a choice for the external user of reviewing/updating limited information in the case management system (Cúram software), viewing case documents in the repository (FileNet software) or filing using e-forms (FileNet software). Figure 1 illustrates the "split access" concept.

Figure 1
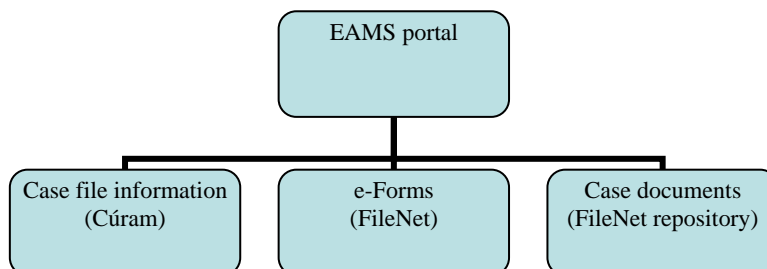
B. Increasing the number of external user licenses and changing the license type

DIR/DWC currently holds 1,000 single named user licenses for external users, and has an option to purchase 1,500 more.

DIR/DWC is actively engaged in discussions with its main software vendors regarding licensing cost models. Both IBM/FileNet and Cúram (the main system software components) are providing information and support needed to re-craft the licensing models in a way that truly meets the needs of both the DWC and external users.

As the DIR/DWC's electronic access progresses, the system of logon distribution will be continuously evaluated and will be adjusted based on changes in needs and usage.

C. Introducing a "file only" level of access utilizing the current e-forms
This allows third-party, non-case participant entities a logon to use e-forms to file forms and documents on behalf of case participants who are their clients. Since these users are not case participants they do not need and will not have access to the documents in the case file.

This access is contingent on filing e-forms with a less than 10 percent error rate.

Currently, DIR/DWC has two third party filer (TPF) vendors involved in a trial program to assist DWC in developing policies and procedures for additional TPFs.

Providing this file-only access allows far more external parties to file electronically, which reduces the amount of OCR scanning, and resulting paper backlog in many district offices, and provides faster scheduling of hearings.

D. Expanding the amount of information obtainable without a logon
DIR/DWC will expand the information available on its public search page to provide external users with the principal information they need about their cases without having to use a logon, which will reduce the number of logons that must be given out to those who simply want to view this basic information.

E. Revising optical character recognition (OCR) forms
Not all external users will be able to file electronically. Unrepresented injured workers without computer access are an example of this type of user. DIR/DWC will revise and simplify the OCR forms, which will simplify the scanning process and improve access for all users.

SECTION 6
DESCRIPTION OF PLAN TO DEVELP NEW FILING METHOD FOR EAMS

Second Generation Electronic Filing
DIR/DWC will develop and introduce new methods of electronic filing which bypass both e-forms and OCR paper forms and decreases manual intervention.

One method has been referred to as "bulk filing," "peer to peer filing" and "second generation electronic filing" and is the DIR/DWC's highest priority for EAMS.

Additionally, DWC may provide electronic access on an individual office basis utilizing Web based solutions. Such an approach envisions a user friendly interface, potential real time data population/verification, minimized data entry, printing of forms, direct data transmission and automatic return notification of errors.

DIR/DWC is engaged in a dynamic process with external users who are providing input on technical requirements for the second generation electronic filing methods. See the "External Stakeholder Participation" portion of this document for details on external user involvement in the development of this new filing method.

See the "EAMS Access Project Schedule" for timeline details.

SECTION 7
DESCRIPTION OF PLAN TO DEVELOP NEW VIEWING METHODS FOR EAMS

Expanding Electronic Viewing
In addition to providing the "split access" described in section 5, DIR/DWC will expand the information available on its public search page to provide external users with the basic information they need about their cases without having to use a logon.

The information currently returned for viewing on the public search page is described in section 4. External users are being surveyed to determine the exact information they would like returned on an expanded search page. The additional information being evaluated for inclusion on the public search page includes:[2]

- Active cases
- Body parts
- Case events
- Case participants
- Case status
- Claims administrator
- Claim number
- Date of injury
- DEU ratings
- Documents list
- EAMS case number
- Employer name
- Inactive cases
- Injured worker first and last name
- Insurance company name
- Judge and hearing date
- Legacy case number

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[2] DWC will need to redact personally identifiable information, and provide for sealing of body parts if an order sealing records exists in the case.

- Official address record, including uniform assigned names associated with a case
- Preferred method of service
- Return to work information
- Venue
- WCIS number

If this functionality can be developed outside of, and without touching the main software components of EAMS, there will be no impact on licenses. If, however, this cannot be configured so that it does not impact software licenses, DIR/DWC will need to ensure its licensing agreement includes view access to the information the public search feature returns without the necessity of logons.

Access to documents themselves—as opposed to case file information—can be provided through the split access described in section 5 or, for those without logons, through a request process, either submitted and fulfilled electronically or submitted and fulfilled physically at the district offices by copying the documents to a storage device.

SECTION 8
DESCRIPTION OF PLAN TO MANAGE ACCESS TO EAMS

Management of Logons in Current System
Current e-form trial users are provided a unique user name. The user name is associated with the primary administrator of the e-filing office. A unique password in the form of a logon is assigned to the user name, which allows access to the cases to which the user is a party.

Concurrent Service Levels and Total Permitted Volume of External Users
      A. Assumptions: Identifying user groups for electronic filing
As of November 12, 2009, there were 3,179 representatives' offices and 424 claims administrators' offices registered with uniform assigned Names (UAN). Assuming the vast majority of the representatives' and claims administrators' offices have been registered (nearly one year post go-live), DIR/DWC presupposes these combined numbers should not increase by more than 15 percent over the next several years. Accounting for this level of growth, the maximum estimated total of representatives' and claims administrators' offices would be 4,143.

Referring to section 5C of this policy, a TPF filing on behalf of others will be using a license via a logon. It is assumed that each vendor, although filing on behalf of multiple different external parties, will be using one license. Currently, there are two such vendors filing in a trial program.

The number of lien claimants is estimated at approximately 8,000, based on the number of EDEX users in 2007, with a multiplier of three to represent individual users. It is assumed that many of these lien claimants will file through third party vendors. However,

estimating the numbers is extremely difficult at this point. It is assumed that some high volume filers will not be utilizing third party vendors to file their documents.

Level of Service Commitment
All users will be provided some level of access to their case information, whether it is view only, file only, or full electronic access.

View access to the information listed in section 7 will be available to all case participants without a logon.

By providing "view" access through the search function described in section 7 of this policy, DIR/DWC greatly reduces the number of logons that must be given out for view purposes. View access beyond this can be provided through a request process, either submitted and fulfilled electronically or submitted and fulfilled physically at the district offices by copying case documents to a storage device.

"File only" logons will be provided to authorized third-party, non-case participant e-form filers who file on behalf of case participants.

Logons will be assigned for those offices given electronic filing capabilities in the current system described in section 4(1) of this policy. Those groups will be:

- Attorney representatives
- Non-attorney representatives
- Claims administrators
- Third party vendors filing on behalf of case participants
- EDD/State Disability Insurance (SDI) program
- High volume lien claimants

Unrepresented injured workers will be provided with view access to the information listed in section 7 and will be provided with documents from their file upon request by copying case documents to a storage device. DIR/DWC will explore methods for providing short term electronic access to the injured workers' case information and documents.

DIR/DWC will support logon access (file only and full electronic access) to up to 4,000 offices. DIR/DWC will limit concurrent access to 3,600 users as described below.

A. Initial level of service for current electronic filing method: Present to 12 months from now
DIR/DWC recognizes that in the current system, even when access is split, it may not be able to provide electronic access to all potential case participants until an effective way to manage user accounts is implemented. In the future, DIR/DWC will be in a position with its infrastructure, personnel and electronic filing mechanism to provide full electronic filing to all involved. In the short term, DIR/DWC must focus on its immediate capabilities.

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The main constraints in determining the initial level of service for electronic filing are hardware infrastructure and the number of staff required to adequately and efficiently provide excellent service to external users. DIR/DWC is presently conducting a stress test to measure the capacity of its hardware and bandwidth, the results of which will guide the setting of ongoing level of electronic service. Presently, EAMS is capable of handling 5,670,000 batches per year, or approximately seven (7) times the estimated annual filing load.

DIR/DWC has over 250 logons assigned in its e-from trial.

Setting up an e-form logon for an external user is manpower intensive. External users complete and submit the e-form trial application. The application lists a primary and alternate administrator for the external user. These two individuals are responsible for training as well as being the sole points of contact between DIR/DWC and their office regarding e-form issues. This process is managed by the DWC Electronic Filing Administrator (EFA).

EFA:
- ➢ Confirms the external user's office is registered in EAMS, generally with a uniform assigned name (UAN). If not registered, contacts DWC Central Registration Unit (CRU) to register
- ➢ Registers both administrators in EAMS as persons and associates their employment to their office listing/UAN
- ➢ Further registers the primary administrator as an external user, and at the same time assigns a user name based on the primary administrator
- ➢ Repeats these steps for all e-form filers
- ➢ Prepares a detailed spreadsheet with the externals user information
- ➢ Emails a portion of the spreadsheet to DIR Information Services (DIR-IS)
- ➢ DIR-IS creates the active directory, assigns a password to the user name and automatically emails the user name and password to the primary administrator. The user name plus password is the logon
- ➢ Changes to administrator, contact information, etc: EFA makes changes to the external user information in EAMS; if necessary, updates the spreadsheet; and notifies DIR-IS of the change if it is to the user name, password or email address
- ➢ DIR-IS manages the active directory, updating information provided as necessary by EFA.

Additionally, ongoing training for e-form filers is required. DIR/DWC has created an e-form reference guide and conducts mandatory Web-based training for new users before they begin e-filing. Ongoing webinars are conducted on a monthly basis, or more or less frequently as the situation dictates. This is currently DIR/DWC's most efficient method for providing training, information and guidance.

When e-forms are filed incorrectly, unsuccessful documents/batches are stored in the unprocessed document queue (UDQ) until manually processed by a DWC staff member.

Presently, only one central staff person resolves these errors full time, with one part-time assistant. DIR/DWC's goal is to have staff trained at each district office to handle the e-form UDQ locally, thus greatly increasing the ability to add further e-form filers.

Since September 2008 DIR/DWC has gradually added additional e-form filers, as its resources have allowed, and will continue to do so as follows:

➢ EFA assigns a logon based on a user name and password
➢ EFA determines the size of the office and issues an appropriate number of logons to the office. To determine the number of separate logons an office may require, EFA will query its database using the UAN to find out how many integrated (INT) cases they have pending
➢ EFA will set levels that determine how many logons to assign an office
➢ Initially, EFA would continue to issue a single logon per office for most filers, with a limited number receiving more than one
➢ All participants assigned more than one filing logon will be informed at the time they are assigned that the DWC, in its sole discretion, may deactivate any logons in excess of a single logon. This would be based on maintaining the concurrency limitation as well as the volume of filing done by the external user. Should the external user not be electronically filing at a volume sufficient to warrant the use of the number of logins assigned, they can be reduced and reassigned.

DIR/DWC will continue to expand electronic access while new access methods are being developed by periodically issuing logons in groups of up to 100 per new round of the e-form trial. The target will be to add additional users every two months. Preference will be given to adding attorney representative offices and claims administrator offices based on filing volume, as well as third party e-form filers. This will continue subject to the DIR/DWC infrastructure and personnel constraints.

DIR/DWC will commit to maximizing the public view access as described above during this phase, consistent with the results of the external user survey, and giving due consideration to applicable privacy laws.

B. Level of service: 12 months to 2-3 years
While DIR/DWC is expanding the current electronic filing method to provide efficiencies in the current system, it is adding new methods of electronic filing as described in section 6 of this policy.

The addition of these new filing methods will facilitate lessening of the labor intensive approach noted above, and movement to a more automated electronic system.

Based on the assumptions made above, DIR/DWC can give logon access to 4,000 offices and cover every office in the groups listed above. If concurrent access is limited to 3,600 the likelihood of DIR/DWC exceeding that number is very small. Logons for view access are minimized if DIR/DWC expands viewing access as described in section 7 of this policy.

DIR/DWC will continue to add users in groups of 100 as described above until all offices described in Section 7 are provided file only or full electronic access.

DIR/DWC will explore methods for providing short term electronic access to unrepresented injured workers' case information and documents. Due consideration must be given to the technical and security issues associated with providing short term, limited electronic access.

Management of New Electronic Filing Methods
DWC's vision for second generation electronic filing methods for EAMS is that they be designed in conjunction with external users, thoroughly tested for efficacy before being put into use, and that they minimize manual intervention.

For those utilizing the peer-to-peer or bulk filing solution, logons will be assigned as necessary for the office, much in the manner in which they are assigned presently.

For those utilizing Web based electronic access, DWC envisions assigning logons to the office, much in the manner currently in effect. In these situations, the external users' EAMS office administrator would be responsible for handling registration and issuance of passwords to individuals within the office.

SECTION 9
SUMMARY

The two methods of filing in EAMS (OCR and e-forms) are significant improvements on the previously utilized fully manual data entry systems. However, DIR/DWC needs to provide additional, more effective ways to electronically file documents, and to provide external users with more efficient access to case information and documents, all within a limited budget. Toward that end, DIR/DWC intends to employ a combination of solutions, including:

1. Increasing the number of external user licenses, and changing the license type to better meet external user needs
2. Introduce a "filing only" level of access utilizing the current e-forms.
3. Introducing "split access," which means creating a single sign-on that provides the external user with a choice of reviewing/updating limited information in the case, viewing case documents or filing using e-forms
4. Development of a "bulk filing" or "peer to peer filing" method which bypasses both e-form and OCR paper forms and decreases manual intervention
5. Development of Web based electronic access on an individual office basis
6. Revision of OCR forms to simplify the preparation of the forms and to simplify the scanning and data capture processes, and
7. Expansion of the information available on the DIR/DWC public search page to provide external users with the basic information they need about their cases without having to use a logon.

To manage these multiple solutions, DIR/DWC will support logon access to up to 4,000 offices and will limit concurrent access to 3,600 users. Logons will be assigned as necessary for each office, and managed in much the same manner in which they are assigned and managed presently.

By providing these multiple solutions, DIR/DWC will provide external users with the most efficient methods possible to file forms and documents in EAMS, as well as to review information in the case file, and will meet the overall objectives for access to the system outlined in section 1.